



Submission Guide

Cleaning Up our Act Discussion Paper

<https://yoursay.dpie.nsw.gov.au/plastics-plan>

Reduce plastic waste generation

Proposed target: phase out key single-use plastics

Priority direction 1: Harness people power to create a fundamental shift in the way we use plastic

People power is most effective when backing government leadership and good policy. As the recent IPSOS poll shows the people have already spoken:

Three in four (74%) Australians indicate a preference for purchasing products that use as little packaging as possible.....69% of Australians favoured a ban on single-use plastics, and as soon as possible.

IPSOS 'Throwaway World' poll 2019

There are a number of community-based initiatives such as Responsible Cafes and Ocean Friendly Businesses (Surfrider Foundation) and, as referenced in this Discussion Paper, Plastic Free Places (Boomerang Alliance). These are making a difference by encouraging individuals and the hospitality sector to change practices.

These initiatives create awareness but are most effective when supporting a government phase-out or ban.

Priority direction 2: Set standards for consumer items to design out plastic waste

Packaging should be subject to the targets set in the National Waste Strategy and the position endorsed by all State and Territory Governments (including NSW) that *all packaging must be reusable, compostable or recyclable by 2025.*

Reusable, compostable or recyclable should mean that packaging is reused, composted or recycled in practice and at scale.

In our view the NSW Government should introduce mandatory requirements on packaging material, recovery and honest labelling. The Government should also back national efforts to make these requirements consistent through a national Product Stewardship for

packaging Scheme, with mandated targets. However, it should not delay action waiting for federal processes.

Priority direction 3: Phase out key single-use plastic items

These are the problem products predominantly used away from home and represent a particular waste and litter problem.

We welcome the stated intention in this Discussion Paper that NSW will impose a ban on lightweight plastic shopping bags. Heavyweight plastic shopping bags (< 70 microns) should be included. This should be introduced as soon as possible.

Three jurisdictions (South Australia, Australian Capital Territory and Queensland) have already announced intentions to phase out certain single-use plastics. These phase-outs include plastic straws, stirrers, cutlery, cups, bowls and plates and include polystyrene and oxo-degradable food ware.

NSW should follow this example and phase out these items and include other problem plastic items such as condiment sachets/containers, balloon sticks, plastic cotton buds and barrier bags.

All of these items can either be avoided or have preferred alternatives. These alternatives include expanding reusable food ware options for away from home takeaway services (the best option) or switching to non-plastic items (e.g. paper straws, wooden cutlery, sugarcane/palm frond plates and bowls).

The Australian commercial compost standard (AS 4736/AS 5810) could be applied as a last resort, where products do not currently have a preferred non-plastic alternative.

NSW has had a ban on the deliberate release of more than 19 helium balloons since 1999. This ban is not policed and has not stopped the practice. We propose that the NSW Government take the important step to ban the release of balloons, ban the use of helium to inflate balloons, and phase out mylar balloons and balloon sticks. Whether they are intentionally released or not, helium balloons pose a significant environmental threat. An interim measure could be to require warnings on balloon packaging and helium tanks

The most littered items, cigarette butts, are plastic and urgently need to be addressed as well.

Making the most of our plastic resources

Proposed target: Triple the proportion of plastic recycled in NSW across all sectors and streams by 2030

It is important to note that avoiding, reducing and composting are also part of the targeted solutions to addressing single-use plastics. Recycling is essential but only for the products that cannot be avoided, reduced or composted.

Priority direction 4: Make producers of plastic items more responsible for collecting and recycling in NSW

The global Plastic Pact (Ellen MacArthur Foundation), that the Australian Packaging Covenant Organisation has committed to join, backs this position, stating:

'Businesses producing and/or selling packaging have a responsibility beyond the design and use of their packaging, which includes contributing towards it being collected, reused, recycled or composted.'

'Governments are essential in setting up effective collection infrastructure, facilitating the establishment of related self-sustaining funding mechanisms and providing an enabling regulatory and policy landscape.'

Priority direction 5: Mandate 30% minimum recycled content in all plastic packaging in NSW by 2025

APCO has recently set a target of 50% minimum recycled content in packaging by 2025.

NSW should aim higher than 30% minimum recycled content - to at least 50%.

Priority direction 6: Support demand and industry capacity

In our view the NSW Government should introduce mandatory requirements on packaging recovery and honest labelling. The Government should also back national efforts to make these requirements consistent.

The most effective approach to address packaging and to meet the 2025 targets is to have an effective EPR or Product Stewardship (PS) Scheme for Packaging. Such a scheme must include mandatory recovery targets. Government cannot rely on co-regulatory or voluntary schemes such as the current arrangements with APCO. These arrangements have been in place for over 20 years. In 1999 plastic packaging recovery was 20% (APC), and in 2019 it was 16% (APCO).

Boomerang Alliance's position on product stewardship and labelling calls for a PS Scheme for Packaging with mandated targets and requirements on labelling that ensure products are recovered, in practice, as opposed to aspirational targets.

Reducing plastic waste leakage

Proposed target: reduce plastic litter items by 25% by 2025

Priority direction 7: Use extended producer responsibility schemes to fund litter collection and end-of-life plastic management

Extending the scope of PS schemes to include litter collection makes sense. This paper estimates that it costs governments in NSW over \$167 m per year for litter clean up. Plastic litter from packaging forms a significant proportion of this.

Priority direction 8: Invest in infrastructure that can better manage plastic before it causes harm

Coupled with a PS Scheme for Packaging, effective investment will assist industry to collect and recover any used plastics. Many recycling MRFs are out of date, many regions do not have adequate commercial or community composting facilities, and across NSW LGAs have different collection services (largely based upon the capacity of their local MRF). Introducing government procurement policies for recycled content and mandating recycled content requirements for major civil works will create a market for recycled plastics.

Improve our understanding of the future of plastics

Proposed target: Make NSW a leader in national and international research on plastics

This can be set in the context of having a long term NSW Plastic Pollution Reduction Strategy that examines the use of all single-use plastics by all sectors and includes plastics in the home, away from home, in agriculture, in business and industry and in the marine environment.

Priority direction 9: Set up a NSW plastics research network by 2021

There is a lack of information on the source, extent and impact of plastic pollution on wildlife, the environment and human health (particularly when microplastics enter the human food chain). This must be urgently investigated. As reported in the New Plastics Economy Report 2016:

'At least 8 million tonnes of plastic leak into the ocean every year. By 2025 the oceans will contain one tonne of plastic for every three tonnes of fish and by 2050 more plastic than fish'

Priority direction 10: Support commercialisation of research-driven plastics solutions

Whilst global innovation in avoiding, reducing or developing alternative solutions to single-use plastics is proceeding, very little seems to be done in Australia. The NSW Government should take a leadership role on this and create a reputation for excellence in this area and develop new business opportunities based up eliminating unnecessary single-use plastics.